



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 07 2016

CERTIFIED MAIL 7014 2870 0000 3318/ 3098
RETURN RECEIPT REQUESTED

City of Anderson
Attn: Mr. Jeff Caldwell, P.E.
Director, Utilities Division
601 South Main Street
Anderson, South Carolina 29624

Re: Review of the Continuing Sewer Assessment Program
Administrative Order on Consent, Docket No.: CWA-04-2014-4754

Dear Mr. Caldwell:

The U.S. Environmental Protection Agency Region 4 has reviewed the Continuing Sewer Assessment Program (CSAP) for the City of Anderson (the City) pursuant to Section III.17.G of the subject Administrative Order on Consent (AOC) above. The EPA has identified the following questions and issues needing additional clarification.

CSAP Questions and Comments:

1. Section 2.5: The City needs to ensure the entire Wastewater Collection and Transmission System (WCTS) is evaluated every ten (10) years. How will the City ensure this occurs if the priorities and sewersheds evaluated change year-to-year?
2. Section 2.6: When does the City plan on deciding whether to hire additional City employees or use third party contractors for CSAP work?
3. Section 3.3: Please provide additional information on how the City will prioritize repairs discovered during Corrosion Defect Identification and procedures for a defect analysis, as required by Section III.17.G.ii of the AOC?
4. Section 3.4: How will the City ensure that all manholes are inspected within the ten (10) year cycle?
5. Section 3.5: How will the City determine how many flow monitors to use? Who is responsible for making this decision? Who decides what monitoring equipment will be used?
6. Section 3.5.4: When will the database to establish base flow rates be developed? Who will be responsible for maintaining and updating the database?

7. Section 3.5.5.1: The City states that equipment will be “inspected and/or recalibrated periodically as needed.” Equipment should be maintained at a minimum based on manufacturer’s specifications. How will City staff know when routine or preventive maintenance should be conducted?
8. Section 3.6: Should all sewer lines be cleaned to ensure there are no blockages or debris before being inspected with a closed circuit television (CCTV)? Where will the CCTV data be stored, and how can it be accessed at a later date? Will the video footage be kept? Who is the “designated individual” (by title) responsible for maintaining the CCTV data?
9. Section 3.8.1: Who is the “designated individual” (by title) responsible for maintaining smoke testing reports?
10. Section 3.9: Is the City considering updating the Sewer Use Ordinance to have more jurisdiction over private laterals? Can the City get the health department involved or disconnect water service if a private lateral is causing a large problem and the owner is unwilling to fix it?
11. Section 4: What remote sensing technology will the City use at the pump stations?
12. Section 4.2: When will the City evaluate each pump station’s five (5) year inspection and maintenance history, as required by Section III.17.G.viii.d of the AOC?
13. Section 4.2.5: What are the protocols for the root cause failure analysis?
14. Section 7.1.2: When will the City decide which Computerized Maintenance Management System package that will be used?

Please contact Ms. Sara Janovitz at (404) 562-9870 or via email at janovitz.sara@epa.gov, within five (5) days of receipt of this letter to schedule your attendance at a meeting either in person or via telephone conference.

Sincerely,



Alenda E. Johnson, Acting Chief
Municipal & Industrial Enforcement Section
NPDES Permitting and Enforcement Branch

cc: Mr. David Baize
South Carolina Department of Health and Environmental Control